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STANDARD CHLORINE OF DELAWARE, INC.

GOVERNOR LEA ROAD • P.O BOX 319 • DELAWARE CITY, DELAWARE 19706

March 13, 1985

Ms. Laura Boornazian (3HW23)
U. S. EPA Region III
Superfund Branch
841 Chestnut Building
9th. and Chestnut Streets
Philadelphia, Pa. 19107

HAND DELIVERED

Dear Ms. Boornazian:

This letter is in response to Mr. Wassersug's letter dated 12 February 1985, requesting information concerning a release, or threat of a release, of a hazardous substance into the environment. As we discussed during our meeting at the Standard Chlorine of Delaware, Inc., offices in Delaware City on 6 March 1985, complete compliance with the specifics of that letter would represent an onerous burden upon our limited manpower. Your clarification of the intent of that letter was most helpful, in that we now understand that you require sufficient information on this subject to conduct a hazard scoring on our plant.

As you are now aware, based upon the briefing we provided at our meeting, Standard Chlorine has been conducting an investigation into the potential for environmental degradation and remedial action at our Delaware City Plant since October of 1981. These efforts were triggered as our response to an accidental spill of reagent grade monochlorobenzene which occurred on 16 September of that year. These efforts have been conducted by the consulting firm of Roy F. Weston, Inc., and have been conducted under the guidance and approval of the Delaware Department of Natural Resources and Environmental Control (DNREC) throughout the process. Based on the results obtained to date it is our opinion that the contamination present is contained in the Columbia aquifer within a narrow plume and that it presents no threat to Potomac aquifer drinking water supplies due to the confirmed presence of a continuous Potomac Clay confining layer beneath the entire site. A remedial action has been recommended to us by WESTON, and has been approved by DNREC. WESTON has provided complete design specifications for the selected remedial action, and has provided assistance in obtaining all the permits necessary to implement the State-approved action. Recovery wells have been drilled, installed and outfitted with permanent pumps, pipelines and electrical services are in-place, and all remaining components of the treatment plant are on order. Construction is underway, with anticipated start-up of the clean-up operation scheduled in June, 1985. WESTON's reports have documented all aspects of this work.

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HAZARDOUS WASTE MANAGEMENT

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EPA - Region III

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Ms. Laura Boornazian (3HW23)
U. S. EPA Region III

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13 March 1985

Upon receiving this briefing you agreed that a much more limited data submission would be appropriate, at least at the outset. Such a limited submission would entail, as you suggested, review copies of all the WESTON reports, copies of the permits obtained, and several other supporting documents. As we agreed, attached please find two complete copies of these documents for your review and further use. Should you require additional information, please let me know and Standard Chlorine will try to provide it in a timely fashion.

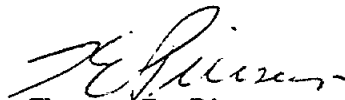
Standard Chlorine considers certain information in these reports to be confidential business information. Since Standard Chlorine is in a very competitive industry the release of this material could give our competitors a definite advantage. These sensitive documents are designated as confidential on the covers and title pages. A list of all documents is attached to this letter. Would you please sign it as verification of receipt and return it to my attention?

In closing, please let me restate Standard Chlorine's commitment to taking responsible action in attaining cleanup at our site. We are chagrined at the possibility that additional regulatory participation and requirements for this project could delay starting operation of the ground water recovery and treatment system. Any assistance you or your office may be able to provide will be greatly appreciated, so that we may arrive at an informed decision as to whether or not to proceed with the State approved remedial action.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

STANDARD CHLORINE OF DELAWARE, INC.



Thomas E. Pierson
Plant Manager

TEP/jb

Enclosures

cc: S. R. Wassersug, EPA
A. R. Sinibaldi
A. Thomas Weston
R. Touhey, DNREC
G. Esposito
M. Wiener

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STANDARD CHLORINE OF DELAWARE, INC.

GOVERNOR LEA ROAD • P.O BOX 319 • DELAWARE CITY, DELAWARE 19706

March 13, 1985

THE BELOW LISTED DOCUMENTS WERE RECEIVED FROM STANDARD CHLORINE OF DELAWARE, INC.:

- 2 ea. Amended NPDES Permit Number DE 0020001
Effective date May 10, 1984
Expiration date May 09, 1989
Amended: January 21, 1985
- 2 ea. Fact Sheet for Amended NPDES Permit Number DE 0020001
- 2 ea. Authorization to construct under the Laws of the State of Delaware Permit Number WPCC 3055/84
Effective date January 8, 1985
Expiration date January 8, 1987
- 2 ea. DNREC Water Allocation - Allocation Number 84-0035
Effective date December 10, 1984
Expiration date December 10, 1994
- 2 ea. DNREC Permit APC-82/105 Operation Amendments Number One
Amended December 19, 1983
And Number Two Amended February 3, 1984
For Standard Chlorine of Delaware, Inc. Boiler Number 3 - Delaware City
- 2 ea. DRBC Emergency Certificate
Standard Chlorine of Delaware, Inc.
Treatment Facility Modifications for Removal of Benzene from contaminated ground water
DRBC File Number D-84-51
- 2 ea. DRBC Docket No. D-84-51
Standard Chlorine of Delaware, Inc.
Recovery and treatment of contaminated ground water, Delaware City, New Castle County, Delaware, dated January 30, 1985.
- 2 ea. DRBC Project Review
Notice of Commission Actions
Date: February 4, 1985
Docket Number D-84-51
- 2 ea. DRBC Notice of Commission Meeting and Public Hearing
Item 11
Date: January 14, 1985

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- 2 ea. DRBC Application for Approval under Section 3.8 of the Compact November 13, 1984.
- 2 ea. Weston Report: Hydrogeologic and Concept Engineering Evaluation of Remedial Actions for A Monochlorobenzene Spill.
- 2 ea. Weston Report: Hydrogeologic and Concept Engineering Evaluation of Ground-Water Contamination.
- 2 ea. Weston Report: An Assessment of the Ambient Air Quality Impact of the Controlled Air Emissions from Standard Chlorine's Proposed Air Stripping Tower.
- 2 ea. Weston Report: Standard Chlorine of Delaware, Inc. Ground-Water Decontamination.
- 2 ea. Weston Report: Feasibility and Final Design Report.

SIGNED: _____

DATE: _____

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